

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/27/08
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THE CITY OF EDINBURGH COUNCIL ON
BEHALF OF THE LOTHIAN PENSION
FUND, On Behalf of Itself and All Others
Similarly Situated,

Plaintiff,

vs.

VODAFONE GROUP PUBLIC LIMITED
COMPANY, et al.,

Defendants.

X

Civil Action No. 1:07-cv-09921-PKC

CLASS ACTION

STIPULATION AND ~~PROPOSED~~ ORDER:
1) DISMISSING CERTAIN DEFENDANTS
WITHOUT PREJUDICE; AND 2) ADDING
NAMED PLAINTIFF

X

WHEREAS, on March 26, 2008, Lead Plaintiff filed and served an amended complaint naming Vodafone Group Public Limited Company, Arun Sarin ("Sarin"), Sir Julian M. Horn-Smith ("Horn-Smith"), Andrew N. Halford ("Halford"), Lord Ian MacLaurin ("MacLaurin"), Peter R. Bamford ("Bamford"), Paul M. Donovan ("Donovan"), Jürgen von Kuczkowski ("von Kuczkowski"), Thomas Geitner ("Geitner"), Alan P. Harper ("Harper") and Kenneth J. Hydon ("Hydon") as defendants;


WHEREAS, on or about April 17, 2008, Lead Plaintiff entered into a Tolling Agreement with respect to the claims asserted against defendants Horn-Smith, Bamford, Donovan, von Kuczkowski, Geitner and Harper; and

WHEREAS, City of Sterling Heights Police & Fire Retirement System, a U.S.-based purchaser of Vodafone ADRs during the Class Period, has provided the Court and defendants with a certification pursuant to the Private Securities Litigation Reform Act of 1995 and intends to join this action as an additional plaintiff to address any perceived concerns about Lead Plaintiff's ability to represent the entire Class at this juncture of the litigation;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, subject to the approval of the Court, that: 1) the claims against defendants Horn-Smith, Bamford, Donovan, von Kuczkowski, Geitner and Harper are hereby dismissed without prejudice; 2) City of Sterling Heights Police & Fire Retirement System shall be, and hereby is, included as an additional Named Plaintiff in the amended complaint; and 3) all of the parties' respective claims and defenses are preserved.

DATED: May 23, 2008

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DATED: May 23, 2008

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Counsel for Defendants

IT IS SO ORDERED.

DATED: 5-27-08



THE HONORABLE P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE